



Via Hand Delivery

October 31, 2011

Brian Jones
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: C00295527
Reply to your September 27, 2011 correspondence concerning CU-PVF's
Amended Monthly Report covering March 1, 2011 – March 31, 2011

Dear Mr. Jones:

I write in reply to your letter dated September 27, 2011, to Kevin Allen, Treasurer of Citizens United Political Victory Fund ("CU-PVF"), requesting additional information regarding CU-PVF's Amended April 2011 Monthly Report, which covers the period March 1, 2011 through March 31, 2011. Your letter requests clarification/correction of two matters. First, you state that the report is missing or has incomplete occupation and/or employer information for several of the contributions disclosed in Schedule A. You request that CU-PVF either (a) file an amended report providing the missing information or (b) provide a detailed description of CU-PVF's procedures for complying with the Commission's "best efforts" requirements for obtaining the contributor identifier information required to be disclosed.

CU-PVF is not filing an amended report at this time because (1) the information disclosed on the report is either the information that the contributor provided to CU-PVF or a statement indicating that the information has been requested from the contributor pursuant to the Commission's "best efforts" requirements, and (2) , as set forth below, CU-PVF's treasurer believes that the procedures CU-PVF has adopted for obtaining and disclosing the identity of its contributors fully complies with the Commission's "best efforts" requirements. Those procedures are as follows:

First, a request for accurate and complete identification is made at the time of the initial solicitation to a prospective contributor. For written solicitations (e.g. direct mail) a response form is included listing the contributor's name and address as it appears in Citizens United's membership records. The form includes a request that the contributor correct any inaccurate or missing information. The form also asks that the contributor provide his or her occupation and employer. For oral

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